

## **EXHIBIT 4**

Declaration of Named Plaintiff  
Caroline Perry

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Caroline Perry, on behalf of herself and all others similarly situated,	)	
	)	Civil Action
	)	No. 4:22-cv-00061-JD
Plaintiff,	)	
	)	
vs.	)	<b>DECLARATION OF CAROLINE</b>
	)	<b>PERRY IN SUPPORT OF MOTION</b>
McLeod Healthcare Network, LLC,	)	<b>FOR APPROVAL OF FLSA</b>
	)	<b>SETTLEMENT</b>
Defendant.	)	
_____	)	

I, Caroline Perry, pursuant to 29 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am over 18 years of age and am competent to testify as to the matters stated herein and know these facts of my own personal knowledge.

2. I am the Named Plaintiff and representative of the collective group of patient-facing healthcare workers in this case brought under the FLSA as a collective action against McLeod Healthcare Network, LLC (“McLeod Healthcare”) seeking to recover unpaid overtime wages.

3. As representative of the collective group, I believe I have a good understanding of the claims that I am making on behalf of myself and the other collective members in this case, as well as the defenses asserted by McLeod Healthcare to those claims.

4. I participated in written discovery in this case and also had my deposition taken by defense counsel on June 30, 2023.

5. I have been involved in the settlement negotiations in this case and am familiar with the settlement agreement reached. I have had ample time and opportunity to review the

settlement agreement in this matter and I have agreed to the terms of it as previously indicated by my signing the same. Counsel has explained the terms of the settlement agreement to me and answered my questions about the settlement, the damages that will be recovered under it, and the law relating to it.

6. I am familiar with the damages sought in this matter and the percentage recovery provided by the settlement reached. I believe that it is a fair and reasonable resolution that provides certain monetary recovery to me and the other class members and eliminates the risk of moving forward with the case.

7. It is also my understanding that McLeod Healthcare discontinued the use of its automatic lunch break deduction policy that is the subject of this case shortly after this lawsuit was filed. I believe that the company's change in policy following the filing of this case is a major victory on behalf of myself and the other health care workers who have and/or currently work for McLeod Healthcare.

8. For all of these reasons, on behalf of myself and the other collective action members, I respectfully request that the Court approve the settlement reached in this case.

9. I declare under penalty of perjury that the foregoing is true and correct.



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Caroline Perry

11/06/2023

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Date